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August 16, 2005

VIA HAND DELIVERY

The Honorable Magistrate Judge Leo J. Sorokin
 United States District Court for the District of
 Massachusetts
 One Courthouse Way, 5th Floor
 Boston, MA 02210

Re: Sheldon G. Adelson v. Moshe Hananel
U.S.D.C Docket No.: 04CV10357RCL

Dear Judge Sorokin:

This letter is our response to Mr. Hamilton's most recent motion, which of course, we oppose. Mr. Hamilton, once again, through the most transparent ruse of a speaking motion, has again done precisely what the Court had ordered the parties not to do – engage in additional exchange of motions, briefs and affidavits outside the issues which the Court has circumscribed in its most recent order.

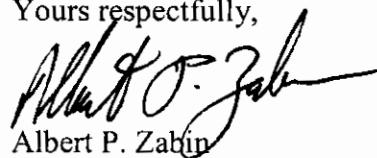
I will not, out of respect for the Court's Order, engage or offer any rebuttal at this time. The Court will recall that we were willing to have an evidentiary hearing; Mr. Hamilton was not. I make only two points: 1.) I reiterate our view, well-supported by cases that we have cited to the Court, that in this posture of the case, the only issue before the Court is whether the Plaintiff has submitted sufficient material to establish a *prima facie* case for personal jurisdiction; 2.) If the Court wishes to explore issues of credibility, we will be pleased to do that in the context of an evidentiary hearing. I can represent to the Court that in addition to the materials that we have furnished the Court in support of our motion for sanctions against Mr. Hananel for fraud on the Court, we have uncovered additional documentation that casts grave doubt on the accuracy of some of the assertions that have been made in Mr. Hananel's name and by Mr. Hananel himself.

If the Court wishes a more detailed or formal response, I would appreciate it if you would advise us, so that our response can be timely.

Duane Morris

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Yours respectfully,



Albert P. Zabin

APZ/kr

Enclosures

cc: James A. G. Hamilton, Esquire [via email and first class mail]